

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

SHIRLEY RADABUAGH

Plaintiff,

V.

CLAY TURNER REALTY GROUP

Defendant.

1:20-cv-00058-JRH-BKE

**MOTION FOR PARTIAL
SUMMARY JUDGMENT**

MOTION FOR PARTIAL SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the annexed declaration of Shirley Radabaugh, dated November 5, 2020; and the exhibits attached thereto; and the pleadings and prior proceedings herein, Plaintiff Shirley Radabaugh (“Plaintiff”) will move the Court, before the Honorable (U.S.D.J.), at the United States District Court, Southern District of Georgia, 600 James Brown Blvd., Augusta, GA 30901, at a time and date to be determined by the Court, for an Order granting partial summary judgment pursuant to Rule 56(a) of the Federal Rules of Civil Procedure in Plaintiff’s favor on the issue of liability for copyright infringement (Count I of the Complaint) against Defendant Clay Turner Realty Group LLC (“Defendant”) and for the summary dismissal as a matter of law of Defendant’s affirmative defenses to liability and for such further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that Defendant shall serve its response, if any, by no later than November 26, 2020.

Dated: Atlanta, GA
November 5, 2020

Respectfully submitted,

CARSON LAW GROUP, PLLC

/s/Dorsey R. Carson, Jr.

Dorsey R. Carson, Jr. (GA Bar No. 940300)
2870 Peachtree Road, NW
#915-3234

Atlanta, GA 30305

Telephone: 601-351-9831

Facsimile: b601-510-9056

Email: dcarson@thecarsonlawgroup.com

LIEBOWITZ LAW FIRM, PLLC

/s/Richard Liebowitz

Richard Liebowitz, Esq. (Admitted PHV)

11 Sunrise Plaza, Suite 305

Valley Stream, New York 11580

Telephone: (516) 233-1660

Email: rl@liebowitzlawfirm.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Plaintiff's motion for partial summary judgment, and all supporting papers submitted in connection therewith, was served on November 5, 2020 via CM/ECF on all counsel of record as follows:

Kristen Turner Jones, Esq.
Turner Jones Legal, LLC
Post Office Box 1703
Lincoln, GA 30817-8703
Email: turnerjoneslegal@gmail.com

Counsel for Defendant

This the 5th day of November 2020.

/s/Dorsey R. Carson, Jr.
OF COUNSEL